



October 20, 2011

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Stephanie A. Joyce

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Re: WC Docket No. 09-144, *Securus Petition for Declaratory Ruling*

Dear Ms. Dortch:

Securus Technologies, Inc. ("Securus") hereby responds to the *ex parte* letter filed by Millicorp in this docket on October 14, 2011 ("Millicorp 10/14/11 Letter").

First, Securus's representations as to the arrangement between Millicorp and the Federal Bureau of Prisons ("FBOP") stand. A knowledgeable person at the FBOP informed the undersigned that the FBOP's general policy of blocking calls to numbers that are not registered in the Line Information Database ("LIDB") remains in place. The undersigned then spoke to the FBOP employee who negotiated the arrangement with Millicorp whereby the FBOP agreed not to block calls placed via local phone numbers provisioned via ConsCallHome, despite the fact that those numbers are not registered in LIDB. That employee also stated that calls to other unregistered local numbers continue to be blocked. That employee also stated that the arrangement with Millicorp was the product of several meetings with Millicorp counsel that began in 2010.

Second, no employee or representative of Securus has, contrary to Millicorp's unsupported assertion, made any "improper threats" to Millicorp. Millicorp 10/14/11 Letter at 2. Securus sent a letter to former counsel for Teleware, the registrant of www.conscallhome.com, in May 2009, requesting that it cease its call diversion scheme and stating that Securus would file legal action to protect its rights and would seek the assistance of state and federal regulators. Teleware responded by threatening a lawsuit for damages and injunctive relief. And indeed it was Millicorp who filed a federal lawsuit against Securus that was dismissed via motions practice.

Please do not hesitate to contact me with any additional questions or concerns: 202.857.6081. Thank you for your consideration.

Arent Fox

Sincerely,

s/Stephanie A. Joyce

Counsel for Securus Technologies, Inc.

cc: Chairman Julius Genachowski (*via electronic mail*)
Commissioner Michael Copps (*via electronic mail*)
Commissioner Robert McDowell (*via electronic mail*)
Commissioner Meredith Attwell Baker (*via electronic mail*)
Commissioner Mignon Clyburn (*via electronic mail*)
Sharon Gillett, Chief, Wireline Competition Bureau (*via electronic mail*)
Austin Schlick, General Counsel (*via electronic mail*)
Zachary Katz, Legal Advisor to Chairman Genachowski (*via electronic mail*)
Margaret McCarthy, Policy Advisor to Commissioner Copps (*via electronic mail*)
Christine Kurth, Legal Advisor to Commissioner McDowell (*via electronic mail*)
Christi Shewman, Legal Advisor to Commissioner Baker (*via electronic mail*)
Angela Kronenberg, Acting Legal Advisor to Commissioner Clyburn (*via electronic mail*)
Albert Lewis, Chief, Pricing Policy Division, Wireline Competition Bureau (*via electronic mail*)
Julie Veach, Associate General Counsel (*via electronic mail*)
Diane Griffin Holland, Assistant General Counsel (*via electronic mail*)
Trent Harkrader, Deputy Chief, Investigations and Hearings Division, Enforcement Bureau (*via electronic mail*)
Marcus Maher, Legal Advisor to Chief of the Wireline Competition Bureau (*via electronic mail*)
Pamela Arluk, Assistant Chief, Pricing Policy Division, Wireline Competition Bureau (*via electronic mail*)
Lynne Hewitt Engledow, Pricing Policy Division, Wireline Competition Bureau (*via electronic mail*)
Michelle Berlove, Pricing Policy Division, Wireline Competition Bureau (*via electronic mail*)
Jennifer Prime, Acting Legal Advisor, Office of the Bureau Chief, Wireline Competition Bureau (*via electronic mail*)
Chin Yoo, Investigations and Hearings Division, Enforcement Bureau (*via electronic mail*)